

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

EARL PARRIS, JR., individually,)	
and on behalf of a Class of persons)	
similarly situated,)	
)	
<i>Plaintiff,</i>)	Civil Action No. 4:21-cv-00040-TWT
)	
vs)	
)	
3M COMPANY, et al.,)	
)	
<i>Defendants.</i>)	

**MOUNT VERNON MILLS, INC.’S RESPONSE TO CITY OF
SUMMERVILLE, GEORGIA’S AMENDED COMPLAINT IN
INTERVENTION**

In accordance with the Court’s February 16, 2023 Order [ECF No. 349], Defendant Mount Vernon Mills, Inc. (“Mount Vernon”) hereby responds¹ to the City of Summerville, Georgia’s (“Summerville”) Amended Complaint in Intervention [ECF No. 351] by incorporating its defenses and responses [ECF No. 291] to

¹ Summerville’s Amended Complaint in Intervention affirms that Summerville is asserting no claims against Mount Vernon. As such, this Response is out of an abundance of caution and to avoid the argument that any defenses or responses were waived.

Plaintiff Earl Parris, Jr.'s Second Amended Complaint [ECF No. 280] as if fully restated herein.

This 1st day of March, 2023.

/s/ William M. Droze
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Inc.*

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1.D., the undersigned counsel certifies that the foregoing filing is prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the within and foregoing MOUNT VERNON MILLS, INC.'S RESPONSE TO CITY OF SUMMERVILLE, GEORGIA'S AMENDED COMPLAINT IN INTERVENTION was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 1st day of March, 2022.

/s/ William M. Droze
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